

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

NICOLE JENNINGS WADE,	)	
JONATHAN D. GRUNBERG, and	)	
G. TAYLOR WILSON	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION
v.	)	
	)	
L. LIN WOOD,	)	FILE NO. 1:22-CV-01073
	)	
Defendant.	)	
_____	)	

**SECOND AMENDED NOTICE TO TAKE VIDEOTAPED DEPOSITION**

To: Andrew M. Beal, Esq.  
Buckley Beal LLP  
600 Peachtree Street, NE  
Suite 3900  
Atlanta, GA 30308

Please take notice that at 10:00 a.m. EST on Tuesday, November 1, 2022, at the State Bar of Georgia, 104 Marietta Street NW, Atlanta, GA 30303, counsel for the Defendant, will take the deposition of Plaintiff, NICOLE JENNINGS WADE, for all purposes under the Georgia Civil Practice Act, including discovery and cross-examination. The deposition will be taken before a videographer and a certified court reporter. The deposition noticed hereunder will be taken pursuant to O.C.G.A. § 9-11-26 and O.C.G.A. § 9-11-30. All parties are invited to attend and examine the witness.

This 27<sup>th</sup> day of October, 2022.

Respectfully submitted,

**DOWNEY & CLEVELAND, LLP**

By: /s/ R. CHRISTOPHER HARRISON  
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**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D) of the Northern District of Georgia, I hereby certify that this pleading has been prepared in compliance with Local Rule 5.1(C) using 14-point Times New Roman Font.

Respectfully submitted,

**DOWNEY & CLEVELAND, LLP**

By: /s/ R. Christopher Harrison  
R. CHRISTOPHER HARRISON  
Georgia State Bar No. 333199  
harrison@downeycleveland.com  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Andrew M. Beal, Esq.  
Buckley Beal LLP  
600 Peachtree Street, NE  
Suite 3900  
Atlanta, GA 30308

This 27<sup>th</sup> day of October, 2022.

**DOWNEY & CLEVELAND, LLP**

By: /s/ R. Christopher Harrison  
R. CHRISTOPHER HARRISON  
Georgia State Bar No. 333199